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September 13, 2021

BY ECF

Hon. Nelson S. Román
United States District Court
Southern District of New York
300 Quarropas Street
White Plains, NY 10601

Re: *Frey v. New York City, et al.*, 21 Civ. 5334 (NSR)

Dear Judge Román

This Office represents Defendant Superintendent of the New York State Police Kevin Bruen in the above-referenced action. We write, with the consent of Plaintiffs' counsel, to respectfully request permission to exceed your Honor's page limit for responsive briefs and that said page limit be extended by fifteen pages, from twenty-five pages to forty pages.

The reasons for our request are because of the scope of Plaintiffs' motion and the complexity of the issues raised therein. Defendants need additional space to address the factual background, the legal history and tradition of New York's firearms law, address the issues of standing for each Plaintiff, and to establish, in any event, that Plaintiffs fail to show a clear likelihood of success. Additionally, the Second Amendment issues raised by Plaintiffs uniquely rest on detailed and thorough historical analysis which requires additional space to adequately address.

We understand the Court encourages and appreciates brevity, but due to the seriousness and legal complexity of Plaintiffs' motion, additional pages are required. This is the first request for a page limit extension by Defendant Bruen. Counsel for Plaintiffs consented to our request for a page limit extension.

We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ Neil Shevlin
Neil Shevlin

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cc: Counsel for Plaintiff (via ECF)

Counsel for New York City &
Dermot Shea (by ECF)